UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CHEW KING TAN, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

GOLDMAN SACHS GROUP INC. and MORGAN STANLEY,

Defendants.

TRAVIS FLORIO, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

GOLDMAN SACHS GROUP INC. and MORGAN STANLEY,

Defendants.

Case No.: 1:21-cv-08413-PAC

Case No.: 1:21-cv-08618-PAC

MICHAEL MERSON, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

GOLDMAN SACHS GROUP INC. and MORGAN STANLEY,

Defendants.

MARK ULANCH, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

GOLDMAN SACHS GROUP INC. and MORGAN STANLEY,

Defendants.

ALMA FELIX, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

GOLDMAN SACHS GROUP INC. and MORGAN STANLEY,

Defendants.

Case No.: 1:21-cv-08752-PAC

Case No.: 1:21-cv-08897-PAC

Case No.: 1:21-cv-10286-PAC

ALISON SCULLY, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

GOLDMAN SACHS GROUP INC. and MORGAN STANLEY,

Defendants.

KEVIN LEE, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

GOLDMAN SACHS GROUP INC. and MORGAN STANLEY,

Defendants.

Case No.: 1:21-cv-10791-PAC

Case No.: 1:22-cv-00169-PAC

NOTICE OF DEFENDANTS' MOTIONS TO DISMISS THE AMENDED CLASS ACTION COMPLAINTS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, defendants Goldman Sachs Group, Inc. and Morgan Stanley (together, "defendants") will move this Court for an order dismissing with prejudice the amended class action complaints in these

coordinated actions, pursuant to Federal Rules of Civil Procedure 8(a), 9(b), and 12(b)(6), and the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4.

In accordance with the schedule set by the Court, Plaintiffs' answering papers shall be filed on or before October 11, 2022, and Defendants' reply papers shall be filed on or before November 21, 2022.

Defendants respectfully request oral argument on this motion.

Dated: August 12, 2022

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